

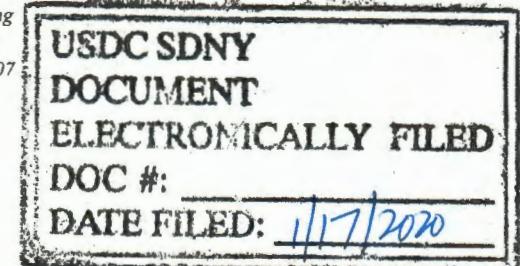


U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

January 17, 2020



**BY ECF**

Hon. Sidney H. Stein  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

Re: United States v. Tortora, S1 18 Cr. 537 (SHS)

Dear Judge Stein:

The Government writes to propose the following pretrial schedule, which the parties have agreed upon, and to request that the Court schedule a final pretrial conference on March 25, 2020:

- The Government will provide defense counsel an enterprise letter by February 14, 2020;
- The Government will produce 3500 material by March 1, 2020, pursuant to a protective order, which will include a provision that no 3500 material may be left in the MDC or any other detention center, with certain designated materials to be produced on an attorneys' eyes only basis until March 16, 2020;
- The parties will exchange reciprocal expert notices, the parties will file motions in limine, and the Government will provide Rule 404(b) notice by March 2, 2020;
- The Government will provide defense counsel with a preliminary exhibit list by March 9, 2020;

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- The parties will file responses to motions in limine and any proposed voir dire by March 16, 2020;
- The parties will file requests to charges by March 24, 2020;
- The parties will appear for a final pretrial conference on March 25, 2020, *at 3:00 pm*  
*. The trial will commence on March 30 at 9:30 AM.*

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

By: /s/  
Lauren Schorr Potter  
Justin V. Rodriguez  
Assistant United States Attorneys  
(212) 637-2276 / 2348 / 2299

cc: Counsel of record (by ECF)

SO ORDERED  
1/17/20  
SIDNEY H. STEIN  
U.S.D.J.